November 7, 2005

Case Control Unit STB Finance Docket No. 34658 1925 K Street, NW, Suite 500 Washington, DC 20423-0001

Attention: David Navecky Environmental Filing

REF: STB Finance Docket No. 34658

Dear Mr. Navecky:

Residents within the 23 Mile Slough Service Area and members of the Eielson agricultural community have reviewed the three alignments through the Eielson farm area that are currently being studied as potential expansion routes for the Alaska Railroad. Comments for each alignment are provided below.

With slight modification, as described below, **N1a** would be the preferred routing of this group, and likely all residents from North Pole to Delta Junction. If **N1a** is eliminated, we would support a new alignment, currently not being studied, and described below as **CC**.

A railroad through the Eielson agricultural area would not be of benefit to area farmers. It would, in fact, have negative impacts as it crosses farms and roads and splits the area into two parts. Splitting the area would be unfortunate as this is the last block of contiguous agricultural land left in the Fairbanks North Star Borough. This area is a unique and irreplaceable resource for Alaska.

Since this project is in large measure for the benefit of the military, it is surprising that more routes on military land are not being considered.

N₁a

This alignment has the least impact of the currently proposed routes, crossing three farms and two roads. These impacts are still significant to the farm community. All impacts could be avoided by moving the proposed crossing of the Tanana River from its current location to one north of the existing farms. This alignment would then be supported by the community. It would have very little impact to area residents and would be the preferred route.

N₂a

This alignment directly impacts seven farms and one newly approved subdivision that is located within the farm area. It also directly impacts the entire farm area as it splits the



area into two parts, farms west, and farms east of the Eielson Farm Road. It crosses two farm roads. It would also negatively impact the recreational activity along the Old Valdez Trail. This proposed route appears to include much of the 1979 routing. Significant objection can be anticipated from land owners. This route would not be supported by the Eielson farm community.

N3

While this alignment may appear to have less land owner impact than **N2a**, it, in fact, has as much or more impact than **N2a** on the farm community. It would cross at least eight farms, two agriculturally classified tracts of State that are currently unsold, several Mental Health parcels and four platted and actively used farm roads. The roads are: 1. Eielson Farm Road, 2. Swede Avenue, 3. Prince St., and 4. Skila St. As with **N1a** and **N2a**, it damages the continuity of the farm area. Finally, this route crosses, in at least five spots, a permitted and actively maintained, widely used recreational trail that has been in use since the early 1970s. The farm community does not support this route.

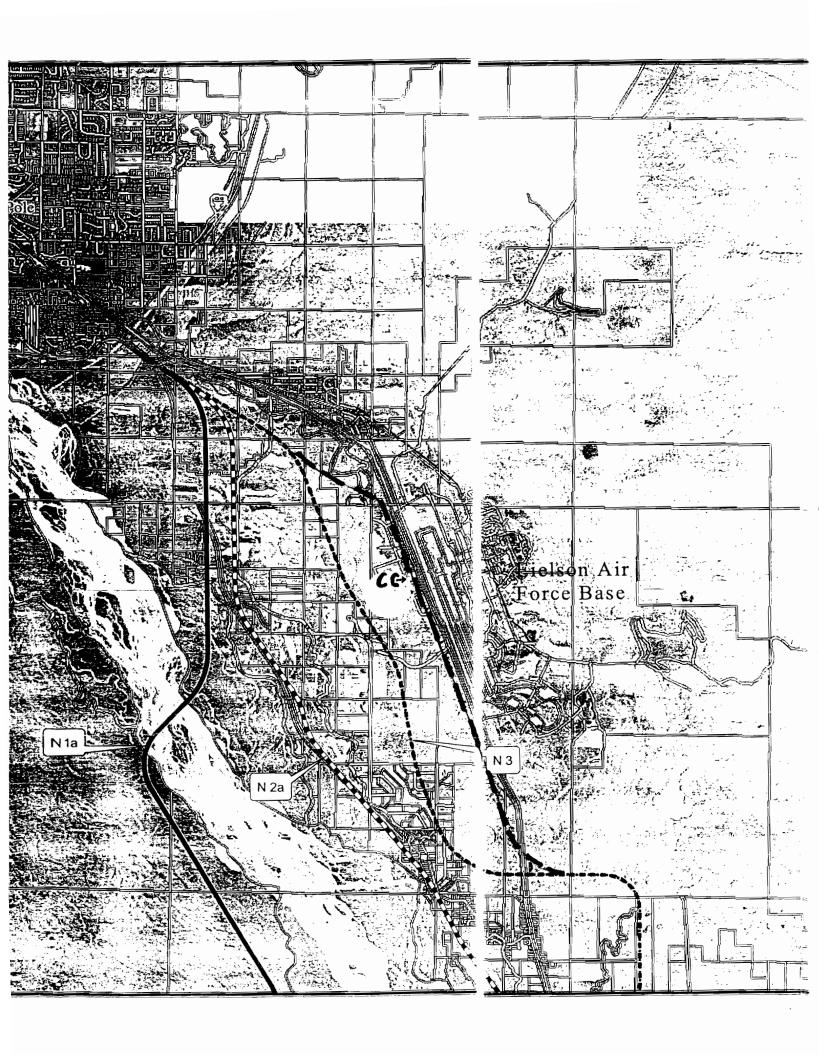
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There is, however, an alternative route (see attached map, route **CC**) not currently studied that would have wide support. This alignment would cross Pile Driver Slough at the north end of the agricultural area, then run between the Slough and the Richardson Highway. Power lines already traverse this general area so it is already an established transportation and utility corridor. This alignment would have three clear advantages over the alignments currently being studied: 1. private property crossings are eliminated, 2. roads crossings are limited to one crossing of the Eielson Farm Road, and 3. it would have the support of the farm community.

We look forward to a written response to these comments.

Thank you, Eielson Farm Community (attached signatures)

Cc Alaska Railroad, Brett Flint



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